

CRIMINAL DOCKET # 03-10367-MEL

UNITED STATES OF AMERICA
VS.
JAMES T. RICHARDS

MOTION FOR PRODUCTION
OF DOCUMENTS

Now comes defendant and hereby requests that this Honorable Court order the Justice Department, the F.B.I., ~~the~~ the Dept. of Homeland Security, the Secret Service, and the employees and contracting agents thereof to produce to the defendant copies of all documents, original or otherwise, or copies of tapes or emails or any other reproduction of textual content from any source whatsoever which were authored by, or appear to have been authored by, or which a reasonable person might reasonably believe or suspect were authored by, the defendant, James T. Richards, DOB 2/26/54, SSN 022-44-6887, during the period November 1st, 2001 to January 30, 2002 and which are in the possession or which at any time came into the possession of the Justice Dept. and/or the FBI and/or the Dept. of Homeland Security and/or Secret Service and/or (any of their employees) and/or contracting agent(s) and/or into the possession of any other law enforcement agency, media organization, private corporation and/or other business entity or any employee(s) thereof and/or any private individual and/or anyone else whomever of whom the Justice Dept., FBI,

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NOTION FOR PRODUCTION OF DOCUMENTS

Dept. of Homeland Security or Secret Service and/or any of ~~the~~ ^{their} employee(s) or contracting agent(s) ~~are~~ ^{are} aware, or which are currently or were at any time in the possession of any federal or state agency, department, bureau or any other governmental organization or any employee(s) or contracting agent(s) thereof, or any foreign entity or organization or anyone else whomever of which the Justice Dept., FBI, Dept. of Homeland Security, Secret Service and/or any employee(s) or contracting agents thereof is aware, ^{that the prosecution produce} and ^{concerning} any note(s) ^{said documents} which were made by the Justice Dept., FBI, Dept. of Homeland Security and/or Secret Service and/or any employee(s) or contracting agent(s) thereof. In addition, defendant requests production of all documents from any source whatsoever which the prosecution intends to use at trial which are not privileged, including all medical reports and documents concerning defendant, and also including all medical reports and documents concerning defendant which are in the possession of the prosecution even if ~~they~~ ^{prosecution} will not be using said documents at trial, and without regard to when the reports or documents were issued or authored.

Finally, defendant requests that the prosecution produce any and all documents which Prosecutor George Toscas himself would want if he were in defendant's position and which ~~are~~ ^{are} not protected by privilege,

and/or which the judge ruling on this would want if he/she
was in defendant's position and which were legally
discoverable documents.

DATE: April 5, 2004

Respectfully submitted,

James T. Richards

James T. Richards, # 36350

P.C.C.C., Cell # GNE-216

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